

# EXHIBIT B

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I hereby certify that this correspondence, and all the papers referenced herein, is being deposited with the United States Postal Services as First Class Mail in an envelope addressed to: **Commissioner for Trademarks, Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria, VA 22313-1451**, on this date July 31, 2006

  
Mary L. Grieco

7/31/06

Date

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Mark: CHARLOTTE RONSON  
Serial Nos. 78507242 and 78507236

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	:
GMA ACCESSORIES, INC.,	:
	:
Opposer,	:
	:
	:
C. RONSON, INC.,	:
	:
Applicant.	:
	:
-----X	

CONSOLIDATED:  
Opposition No. 91167353  
Opposition No. 91168148

**DECLARATION OF MARY L. GRIECO AND EXHIBITS**  
**IN SUPPORT OF APPLICANT'S OPPOSITION TO**  
**OPPOSER'S MOTION FOR SUMMARY JUDGMENT**

Mary L. Grieco, being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18, United States Code, states:

1. I am an attorney licensed to practice law in the States of New York and California and in Washington, D.C. I am an attorney for the Applicant, C. Ronson, Inc. and the assignee to the CHARLOTTE RONSON Trademarks, Sanei Charlotte Ronson, LLC (collectively referred to as "Ronson"). I submit this declaration in support of Ronson's opposition to GMA Accessories, Inc.'s ("GMA") Motion for Summary Judgment.

2. I am one of the attorneys responsible for maintaining Ronson's trademarks in the United States.

3. On October 8, 2004, Ronson applied for the mark CHARLOTTE RONSON in class 25 for use on clothing, namely, tops, pants, skirts, dresses, hats, caps, jackets, coats, headwear, underwear, sleepwear, and footwear, Serial No. 78/507,236.

4. On October 11, 2005, Ronson applied for the mark CHARLOTTE RONSON in class 14 for use on jewelry, namely, necklaces, bracelets, earrings, rings, pins, and watches, Serial No. 78/507,242. The class 14 mark and the class 25 mark are collectively referred to as the "CHARLOTTE RONSON Marks" or the "Ronson Marks".

5. I believe that it is very common in the fashion industry for designers to have the same first or last names as other designers. Thus, there are dozens of trademark registrations that share a common name just as GMA's Marks and the CHARLOTTE RONSON Marks share the name CHARLOTTE. In this regard, I conducted an online search of the United States Patent and Trademark Office ("PTO") records, and below are just a few examples of trademarks I found in the PTO database that share common names in related classes:

#### LAUREN

MARK	REG. NO.	OWNER	CLASSES
LAUREN	2419959	PRL USA Holdings, Inc. (Ralph Lauren)	Classes 14, 18.
LAUREN	2246900	PRL USA Holdings, Inc. (Ralph Lauren)	Class 25.
RALPH LAUREN	2207011	PRL USA Holdings, Inc. (Ralph Lauren)	Class 25.

RALPH LAUREN	1835393 1972538	PRL USA Holdings, Inc. (Ralph Lauren)	Class 14.
CHAPS RALPH LAUREN	2966823	PRL USA Holdings, Inc. (Ralph Lauren)	Class 25.
RALPH RALPH LAUREN	1969298	PRL USA Holdings, Inc. (Ralph Lauren)	Class 25.
LAUREN SCOTT	2971539	Knight Textile Corporation	Class 25.
DENA LAUREN Stylized	2410220	Lawrence Stevens Fashions, Ltd.	Class 25.
JENNIFER LAUREN Stylized	2410215	Lawrence Stevens Fashions, Inc.	Class 25.
SAGE LAUREN	1419281	Grand Knitting Mills, Inc.	Class 25.
LAUREN LEE	1901806	Rhoda Lee, Inc.	Class 25.
LAUREN SARA	1601004	Lauren Sara, Ltd.	Class 25.
LAUREN GUINOT	2945272	Lauren Guinot	Class 14.
LAUREN-SPENCER	2837985	OTC, Inc.	Class 14.
LAUREN G. ADAMS	2719826	JJ Gold, Inc.	Class 14.

### GIORGIO

MARK	REG. NO.	OWNER	CLASSES
GIORGIO BEVERLY HILLS	1008097	Giorgio Beverly Hills, Inc.	Classes 18, 25.
GIORGIO BEVERLY HILLS & Design	1050608	Giorgio Beverly Hills, Inc.	Class 14.
GIANI-GIORGIO	2600385	Giani-Giorgio (Montres) Ltd.	Class 14.
GIORGIO VISCONTI Stylized	2542196	GIORGIO VISCONTI S.P.A.	Class 14.
GIORGIO	1428310	Giorgio Beverly Hills, Inc.	Class 14.

GIORGIO ARMANI	1156891	GA Modefine S.A.	Class 14
GIORGIO ARMANI	2890116	GA Modefine S.A.	Class 25.
GIORGIO MORETTO and Design	1422851	Calzaturificio Giorgio Moretto & C. S.A.S.	Classes 18, 25.
GIORGIO KAUTEN	2221039	Progetti Kauten SpA	Classes 18, 25.
GIORGIO FERRARO	3063355	Gloria Kim	Class 25.
GIORGIO COSANI	2736790	Hovsep Kouzouyan	Class 25.
GIORGIO BY GIORGIO COSANI	2724391	Hovsep Kouzouyan	Class 25.
GIORGIO BISSONI	2510490	Steven Shapiro	Class 25.
GIORGIO EBENNI	2959266	M.E.R. Enterprises, Inc.	Class 25.
GIORGIO SANETTI Stylized	2907738	Sami Marina, Inc. d/b/a Marina Imports	Class 25.
GIORGIO REGGIANI	2786060	Mabro S.p.A.	Class 25
GIORGIO BRUTINI	2715464	Harbor Footwear Group, Ltd.	Class 25.
GIORGIO ZILLIONI	2490699	Paul Jardin of USA, Inc.	Class 25.

## LIZ

MARK	REG. NO.	OWNER	CLASSES
LIZ THOMAS	2507659	Branded LLC	Class 14.
LIZ CORD	2564172	Elisabeth Cord	Class 14.
LIZ GATTA	2423434	Liz Gatta	Class 14.
LIZ SOTO	1562095	Elizabeth M. Soto	Classes 14, 26.
LIZ PALACIOS	2653325	Liz Palacios Designs	Class 14.
LIZ CLAIBORNE & Design	2784512	L.C. Licensing, Inc. (Liz Claiborne)	Classes 9, 18, 25, 35.

LIZ CLAIBORNE	1573265	L.C. Licensing, Inc. (Liz Claiborne)	Class 14.
LIZ	2841408	L.C. Licensing, Inc. (Liz Claiborne)	Class 25.
LIZ & CO.	2765530	L.C. Licensing, Inc. (Liz Claiborne)	Class 25.
LIZ LANGE	2360437	Elizabeth Lange, LLC	Class 25.
LIZ & ME	1431256	Virginia Specialty Stores, Inc.	Class 25.
LIZ PHILLIPS	1429324	Ada Outerwear, Ltd.	Class 25.
LIZ BAKER	1276301	J.C. Penney Private Brands Inc.	Class 25.

## KATE

MARK	REG. NO.	OWNER	CLASSES
KATE SPADE NEW YORK	3092920	Kate Spade, LLC	Class 14.
KATE SPADE	2578942	Kate Spade, LLC	Class 25.
KATE LANDRY	2977007	Dillard's Inc.	Class 14.
KATE LANDRY	2086397	Dillard's Inc.	Class 25.
KATE MACK	2903269	Biscotti, Inc.	Class 18, 25
KATE MILLER	2998401	WE s.n.c. Marco Crevani & Roberto Ugolini	Class 25.
KATE LORD	2830925 2925694	Ahead, Inc.	Class 25.
KATE O'CONNOR	2914228	Kate O'Connor	Class 25.
KATE HILL	2521282	Mary Department Stores Company	Class 25.
KATE SYLVESTER	2572808	Wayne Fraser Conway & Kate Elizabeth Sylvester	Class 25.
KATE KANYON	2370865	Canyon View Cashmere, LLC	Class 25.
KATE COLLINS	1370260	El & E Novelty Co., Inc.	Class 25.

**CARLA**

<b>MARK</b>	<b>REG. NO.</b>	<b>OWNER</b>	<b>CLASSES</b>
CARLA CARINI Stylized	2904276	Carla Carini S.p.A.	Class 25.
CARLA FRACCI	2706093	Carla Fracci	Classes 14, 24, 25.
CARLA CONTI	2090658	Canmi, S.A. De C.V.	Class 25.
CARLA	0868384	Carla Jewelry Corp.	Class 14.
CA CARLA AMORIM Stylized	2845096	CK Amorim Ltda.	Class 14.

**DIANE**

<b>MARK</b>	<b>REG. NO.</b>	<b>OWNER</b>	<b>CLASSES</b>
PRINCESS DIANE (Stylized)	1387179	Diane Von Furstenberg Studio	Classes 3, 25.
DIANE VON FURSTENBERG	2877401	Diane Von Furstenberg Studio	Classes 9, 14, 24.
DIANE POITIERS and Design	3087137	Emcoltex Ltda.	Class 25.
DIANE RAULSTON	3117663	Diane Raulston	Class 25.
DIANE GILMAN	2433104	Diane Gilman	Class 18, 25.
KELLY AND DIANE	2398751	Maggy London International, Ltd.	Class 25.
DIANE'S ESSENTIALS	2389485	GMR Fashion, Inc.	Class 25.
DIANE PETERSON	2371620	Winston Apparel Co., Ltd.	Class 25.
DIANE DALIS	2290791	Compagnie Des Vosges	Class 25.
MAX AND DIANE	1457584	Trans Fashion Industries, Inc.	Class 25.
DIANE LILLI	1411387	Miss Eileen IV, Inc.	Class 25.
DIANE FREIS Stylized	1354293	Diane Freis	Class 25.

**GIO**

<b>MARK</b>	<b>REG. NO.</b>	<b>OWNER</b>	<b>CLASSES</b>
GIO MORETTI	1466096	Bronx S.R.L.	Class 18, 25.
GIO CELLINI	2543722	DiMauro Srl.	Class 18, 25.
GIO'	2185424	GA Modefine S.A.	Classes 3, 25.
GIO BRASSERO	1592116	S&K Famous Brands, Inc..	Class 25.
GIO MONACO & Design	2829240	Pietro Ascione	Class 14.

**CHRISTIAN**

<b>MARK</b>	<b>REG. NO.</b>	<b>OWNER</b>	<b>CLASSES</b>
RALPH CHRISITAN	3108078	Timepieces International Inc.	Class 14.
CHRISTIAN LACROIX	2896646	Christian Lacroix Corporation	Class 8, 14, 21.
CHRISTIAN LACROIX	1499154	Societe Christian Lacroix Company	Classes 3, 9, 14, 18, 25.
CHRISTIAN BERNARD & Design	2382735	Christian Bernard Diffusion	Class 14.
CHRISTIAN BERNARD	2508879	Christian Bernard Stores Corporation	Class 14, 42.
CHRISTIAN TSE	2657542	Christian Hoa Tse	Class 14.
JOHN CHRISTIAN	2278405	Worldwide Jr. Wood d/b/a John Christian Company	Class 14.
CHRISTIAN DIOR	1468222	Christian Dior, S.A.	Class 14.
CHRISTIAN DIOR	0580207 0519367	Christian Dior Couture, S.A.	Class 14.
CHRISTIAN DIOR	0639714	Christian Dior Couture, S.A.	Class 25.
CHRISTIAN DIOR Stylized	0592225	Christian Dior Couture, S.A.	Class 25.
CHRISTIAN BERG	3018056	Anson's Herrenhaus KG	Classes 3, 18, 25.

CHRISTIAN & Design	2593706	Gabriel Tennberg d/b/a Christian International	Class 25.
CHRISTIAN MICHELE	2520926	Group USA	Class 25.
CHRISTIAN GIORGIOU	2434281	American Design Group, Inc.	Class 25.
CHRISTIAN GAINES	2775941	Troyal G. Brooks	Class 25.
CHRISTIAN ALESSIA	2443720	Constantino Congiu Cecchi	Class 25.
CHRISTIAN TRAPANI	2133228	V.S. Sport, Ltd.	Class 25.
CHRISTIAN A.	1879842	Christian A. Inc	Class 25.
CHRISTIAN DE CASTELNAU	1475100	CHRISTIAN SARRAMIA DE CASTELNAU	Class 25.
CHRISTIAN LOUBOUTIN Stylized	1816940	CHRISTIAN LOUBOUTIN	Class 25.

## KLEIN

MARK	REG. NO.	OWNER	CLASSES
ANNE KLEIN	1006943 1049090	Jones Investment Co. Inc.	Class 25.
CALVIN KLEIN	1086041	Calvin Klein Trademark Trust	Class 25.
CALVIN KLEIN	1226396	Calvin Klein Trademark Trust	Classes 3, 16, 24, 25.
MICHEL KLEIN	1395833 2920377	Michel Klein	Class 25.
ANNE KLEIN II	1425808	Jones Investment Co. Inc.	Class 25.
JULIA KLEIN	1581671	Sharilove Fashions	Class 25.
CHARLES KLEIN	1905702	Burlington Coat Factory Warehouse Corp.	Class 25.
FRANKLIN KLEIN	2354070	Makalot USA, Inc.	Class 25.
KLEIN Stylized	2801733	Steven H. Klein d/b/a Klein Acoustic Guitars	Class 15, 25.

**REBECCA**

<b>MARK</b>	<b>REG. NO.</b>	<b>OWNER</b>	<b>CLASSES</b>
REBECCA'S Design	1431259	Rebecca C. Temple d/b/a Rebecca's	Class 25.
REBECCA MOSES	1495162	Studio Enterprises, Inc.	Class 25.
REBECCA LYNN	1482447	Branded LLC	Class 25.
REBECCA STONE	1618870	B.N.B. LLC	Class 25.
REBECCA TAYLOR	2132863	Rebecca Taylor	Class 25.
REBECCA TAYLOR	2919208	Rebecca Taylor	Class 14.
CATHERINE REBECCA	2281397	NSR, Inc.	Class 25.
REBECCA MALONE	2821443	Specialty Retailers, Inc.	Classes 14, 25.
REBECCA V. Stylized	2653238	The Lunada Bay Corporation	Classes 9, 18, 24, 25.
REBECCA JONES	2617542	Jeffery Zinn	Class 25.
REBECCA JEWELL	2585184	Rebecca Jewell	Class 25.
REBECCA BEESON	2994668	Rebecca Beeson Inc.	Class 25.
RGD REBECCA GODSON DESIGN	3050085	Rebecca Godson	Class 14.

**TOMMY**

<b>MARK</b>	<b>REG. NO.</b>	<b>OWNER</b>	<b>CLASSES</b>
TOMMY	2389024	Tommy Hilfiger Licensing LLC	25
	2475142		
TOMMY HILFIGER	1995802	Tommy Hilfiger Licensing LLC	3, 18, 25.
TOMMY HILFIGER	2162940	Tommy Hilfiger Licensing LLC	14, 25.
TOMMY HILL	1173426	Tommy Hilfiger Licensing LLC	25.
TOMMY GIRL	2499283	Tommy Hilfiger Licensing LLC	25

TOMMY SPORT	2923577	Tommy Hilfiger Licensing LLC	25
TOMMY BAHAMA	1802812	Tommy Bahama Group, Inc.	25.
TOMMY BAHAMA	2551210	Tommy Bahama Group, Inc.	14.
TOMMY BOY	2478731	Tommy Boy Music, Inc.	25.
TOMMY-ATO & Design	2563997	Joalan Enterprises Ltd.	25, 28.
TOMMY NUTTER	2297727	J&J Crombie Limited	3, 25.
TOMMY TUCKER T-SHIRTS & Design	2683749	Tommy Tucker T-Shirts, Inc.	25.
TOMMY & OSCAR Design	2645168	Rainbow - S.R.L.	16, 25, 28.

Attached hereto as Exhibit A are printouts of these marks from the Trademark Electronic Search System ("TESS") and the Trademark Applications and Registrations Retrieval ("TARR") system on the United States Patent and Trademark Office website found at [www.uspto.gov](http://www.uspto.gov).

6. Other uses of the first name, CHARLOTTE, are used in the fashion industry. For example, Charlotte Russe and Charlotte Tarantola sell apparel and jewelry, among other products. Attached hereto as Exhibit B are printouts from the Charlotte Russe and Charlotte Tarantola websites showing the marks are currently being used in commerce.

7. Additionally, numerous third-party registrations for marks incorporating the name "Charlotte" coexist on the principal register for the same or highly related goods, including:

MARK	REG. NO.	OWNER	CLASSES	REG. DATE
CHARLOTTE RUSSE	2416268	Charlotte Russe Merchandising, Inc.	Class 18.	12/26/00

CHARLOTTE RUSSE	2416273	Charlotte Russe Merchandising, Inc.	Class 25.	12/26/00
CHARLOTTE RUSSE	2451427	Charlotte Russe Merchandising, Inc.	Class 3.	5/15/01
CHARLOTTE RUSSE	2416269	Charlotte Russe Merchandising, Inc.	Class 14.	12/26/00
CHARLOTTE RUSSE	2414477	Charlotte Russe Merchandising, Inc.	Class 42.	12/19/00
CHARLOTTE RUSSE	2416270	Charlotte Russe Merchandising, Inc.	Class 26.	12/26/00
CHARLOTTE RUSSE Stylized	1485692	Lawrence Merchandising Corporation	Class 42.	4/19/88
CHARLOTTE Stylized	2117619	Ehringer-Schwarz GMBH & Co. KG	Class 14.	12/2/97
CHARLOTTE STING	2232708	WNBA Enterprises, LLC	Class 25.	3/16/99
CHARLOTTE STING	2221962	WNBA Enterprises, LLC	Class 28.	2/2/99
CHARLOTTE STING	2464067	WNBA Enterprises, LLC	Class 18.	6/26/01
PRINCESS CHARLOTTE	2905432	Charlotte Brown	Class 25.	11/30/04
CHARLOTTE CORDAY	2754463	JJJ International LLC	Class 25.	8/19/03
CHARLOTTE & Design	2642133	University of North Carolina at Charlotte	Classes 25, 41.	10/29/02
UNC CHARLOTTE & Design	2634578	University of North Carolina at Charlotte	Classes 6, 16, 21, 25.	10/15/02
CHARLOTTE CHECKERS	2090707	Charlotte Professional Sports Teams, Inc.	Class 25.	8/26/97
CHARLOTTE BOBCATS & Design	2973394	RLJ Basketball, LLC	Class 18.	7/19/05

CHARLOTTE BOBCATS & Design	2978914	RLJ Basketball, LLC	Class 9.	7/26/05
CHARLOTTE BOBCATS & Design	2919999	RLJ Basketball, LLC	Class 28.	1/28/05
CHARLOTTE BOBCATS & Design	2986222	RLJ Basketball, LLC	Class 25.	8/16/05
JOIE DE CHARLOTTE	2868976	Joie de Charlotte Ltd.	Class 3.	8/3/04

Attached hereto as Exhibit C are TESS and TARR printouts of the above-referenced marks.

8. Attached hereto as Exhibit D are printouts from the Charlotte Ronson website, [www.charlotteronson.com](http://www.charlotteronson.com), showing some of the original creations bearing the CHARLOTTE RONSON trademarks.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 31<sup>st</sup> day of July 2006 at New York, New York.



Mary L. Grieco